

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA,

vs.

JOSEPH CARAMADRE

and

RAYMOUR RADHAKRISHNAN

Defendants.

Criminal No. 11-186-S-DLM

**ASSENTED TO MOTION TO EXTEND TIME TO EXCHANGE
TENTATIVE EXHIBIT AND WITNESS LISTS**

Defendant, Joseph Caramadre hereby moves this Honorable Court to extend the time for the defendants to provide their tentative exhibit and witness lists to September 3, 2012. As reason therefor, defendant states the Court's February 15, 2012 Scheduling Order requires the parties to exchange tentative exhibit and witness lists by August 1, 2012. Given the volume of documentary evidence and the number of potential witnesses additional time is necessary for the defendants to provide their respective lists.

The government and co-defendant Raymour Radhakrishnan both assent to this motion.

Wherefore, Defendant Joseph Caramadre respectfully requests that this Honorable Court extend the time for the defendants to provide their tentative exhibit and witness lists to September 3, 2012.

Respectfully submitted,
Joseph Caramadre, defendant
By His Attorneys,

/s/Michael J. Lepizzera, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2012, a copy of the foregoing Assented to Motion to Extend Time to Exchange Tentative Exhibit and Witness Lists was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Michael J. Lepizzera, Jr.
Michael J. Lepizzera, Jr.